

Mar 02, 2023

AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY MD Deputy

KOH

GMM: USAO2023R00063

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA**v.****THOMAS EMMANUEL WILLIAMS****Defendant****CASE NO.** 23-mj-779-AAQ**FILED UNDER SEAL**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

Katherine Rottman, Special Agent with the Bureau of Alcohol Tobacco Firearms and Explosives ("ATF"), being duly sworn, states the following:

INTRODUCTION

1. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. I have been a Special Agent ("SA") with the ATF since June 2020. Prior to being employed by ATF, from 2017 to 2020, I was a police officer with the Seattle Police Department, where I conducted numerous drug and firearms investigations. I have completed numerous training academies, including the Washington State Basic Law Enforcement Academy, Seattle Police Post-Basic, the Federal Law Enforcement Training Center's Criminal Investigators Training Program, and the ATF's Special Agent Basic Training. I have received specialized training regarding, and have personally participated in various types of investigative activities including, but not limited to, the following: (a) physical surveillance; (b) the debriefing of defendants, witnesses, informants, and other individuals who have knowledge concerning violations of federal firearms laws; (c)

undercover operations; (d) the execution of search warrants; (e) the consensual monitoring and recording of conversations; (f) electronic surveillance through the use of pen registers and trap and trace devices; (g) the court-authorized interception of both wire and electronic communications (i.e., Title III wiretaps); and (h) the handling and maintenance of evidence. Based on my training and experience, I am familiar with the means and methods that firearms traffickers use to traffic firearms. I am also familiar with the support and assistance that firearms traffickers require to conduct their illegal activities. I also have become knowledgeable about the criminal statutes of the United States, particularly in the area of the law relating to violations of the federal firearms, narcotics, and conspiracy laws.

3. I have set forth below only those facts that I believe are necessary to establish probable cause for the requested criminal complaint and arrest warrant. I have not, however, excluded any information known to me that would defeat a determination of probable cause. The information contained in this affidavit is based upon my personal knowledge, my review of documents and other evidence, and my conversations with law enforcement officers and other individuals.

4. Based on the below, I respectfully submit that there is probable cause to believe that, on or about January 18, 2023, **Thomas Emmanuel WILLIAMS** (“WILLIAMS”): was in possession of a firearm and ammunition having been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm and ammunition).

Overview of Investigation

5. During this investigation, law enforcement utilized a Confidential Source of information referred to as CS-1. In December 2022, law enforcement officers received information

that an individual named Thomas Emmanuel **WILLIAMS** was dealing in firearms. Law enforcement officers have corroborated the information provided through independent sources wherever possible.

6. During the investigation, law enforcement learned that **WILLIAMS** is a convicted felon and firearms dealer who operates in and around Maryland. My review of **WILLIAMS'** criminal history indicates that he is prohibited from possessing a firearm and ammunition because he is a convicted felon. For example, he was convicted of the felony of Assault 1st Degree, among other charges, in 2000 in The Circuit Court for Prince George's County, Maryland (case number CT992111X), for which he was sentenced to, and served, a term of imprisonment exceeding one year.

January 18, 2023 controlled purchase of firearms

7. On January 18, 2023, CS-1 participated in a controlled purchase from **WILLIAMS** using pre-recorded government funds and at the direction of law enforcement. Prior to the controlled purchase, law enforcement met with CS-1 at a pre-arranged meeting location where CS-1 was searched for any money or contraband with negative results. CS-1 was then outfitted with a body worn wire.¹

8. At the direction of law enforcement and while under constant law enforcement observation, CS-1 traveled to a location in and around Landover, Maryland to meet with **WILLIAMS**. **WILLIAMS** entered CS-1's vehicle and proceeded to sell CS-1 three firearms for a total of \$5,500.00 in U.S. currency. The firearms are described as: (1) one Hi Point 9mm rifle

¹ During the controlled purchase, CS-1's body worn wire failed numerous times and had to be reactivated. As a result, agents called CS-1 on an open phone line and recorded CS-1's interaction with **WILLIAMS** with a handheld device during the controlled purchase.

bearing serial number A40423; (2) one Hi Point 45 ACP pistol bearing serial number X4185563; and (3) one Taurus 85 Ultra Lite .38 special revolver bearing serial number KR63619, loaded with 5 rounds of .38 special ammunition. **WILLIAMS** took the Taurus 85 Ultra Lite .38 special revolver bearing serial number KR63619 off his person to show CS-1 and called the revolver “his baby.” **WILLIAMS** offered to get three “switches” (machine gun conversion devices) for \$4500, but CS-1 asked **WILLIAMS** to purchase those another day.

9. Based on my training and experience with this investigation and others, I know that “switches” is street vernacular for a conversion device that can convert semi-automatic Glock-style pistols into machine guns. This is done by replacing the Glock backplate with a switch-shaped object that modifies the firearm to fire in a fully automatic capacity. A small metal bar in the switch-shaped object overrides the trigger bar in a Glock-style pistol, allowing the firearm to continually fire with the single pull of the trigger.

10. Following the controlled purchase, CS-1 traveled back to the pre-arranged meeting location under the supervision of law enforcement. At the briefing location, CS-1 provided the three firearms from **WILLIAMS** to law enforcement, stating that **WILLIAMS** sold CS-1 the firearms and that **WILLIAMS** was attempting to locate “switches” for CS-1.

January 20, 2023 Controlled purchase of firearms from WILLIAMS

11. On January 20, 2023, CS-1 participated in another controlled purchase from **WILLIAMS** using pre-recorded government funds and at the direction of law enforcement. Prior to the controlled purchase, law enforcement met with CS-1 at a pre-arranged meeting location where CS-1 was searched for any money or contraband location in Laurel, Maryland with negative results. CS-1 was then outfitted with a body worn wire. The entire transaction was both audio and video recorded.

12. At the direction of law enforcement and under constant law enforcement observation, CS-1 traveled to a location in Laurel, Maryland to meet with **WILLIAMS**. **WILLIAMS** and CS-1 spoke in a parking lot where **WILLIAMS** provided CS-1 a bag containing items including firearms. CS-1 in turn utilized the pre-recorded government funds to pay **WILLIAMS** \$6,000.00 in U.S. currency. During the purchase, **WILLIAMS** acquired a “switch” which **WILLIAMS** also provided to CS-1.

13. The firearms are described as: (1) one unmarked PMF (privately made firearm) 556 caliber pistol; (2) one Smith and Wesson M&P 40 .40 caliber pistol bearing serial number HAF3978, (3) one Glock 21 Gen 4 .45 auto pistol bearing serial number AEGN197; and (4) one conversion device. **WILLIAMS** stated to the CS-1 that he (**WILLIAMS**) could get oxy pills and more switches at a later date.

January 27, 2023 Controlled Purchase of firearms and narcotics

14. On January 27, 2023, CS-1 participated in another controlled purchase from **WILLIAMS** using pre- recorded government funds and at the direction of law enforcement. Prior to the controlled purchase, law enforcement met with CS-1 at a pre-arranged meeting location where CS-1 was searched for any money or contraband with negative results. CS-1 was then outfitted with a body worn wire and video recording device. The entire transaction was both audio and video recorded.

15. At the direction of law enforcement and under constant law enforcement observation, CS-1 traveled to a location in Laurel, Maryland to meet with **WILLIAMS**. **WILLIAMS** and CS-1 spoke in a parking lot where **WILLIAMS** sold CS-1: (1) one unmarked 556 caliber Privately Made Firearm (PMF) AR style pistol; (2) one Smith and Wesson SD40 VE 40 caliber pistol bearing serial number FDL2876; (3) one PMF 9mm pistol; (4) 10 oxycodone

pills; and (5) 90 hydromorphone (Dilaudid) pills for \$7600.00 in US currency total. Following the controlled purchase, CS-1 traveled back to the pre-arranged meeting location under the supervision of law enforcement. At the briefing location, CS-1 provided the three firearms and narcotics from **WILLIAMS** to law enforcement, stating that **WILLIAMS** sold CS-1 the firearms and narcotics.

February 3, 2023 Controlled Purchase from WILLIAMS

16. On February 3, 2023, CS-1 participated in a controlled purchase from **WILLIAMS** using pre-recorded government funds and at the direction of law enforcement. Prior to the controlled purchase, law enforcement met with CS-1 at a pre-arranged meeting location where CS-1 was searched for any money or contraband with negative results. CS-1 was then outfitted with a body worn wire. The entire transaction was both audio and video recorded. At the direction of law enforcement and under constant law enforcement observation, CS-1 traveled to a location in Laurel, Maryland to meet with **WILLIAMS**. CS-1 met with **WILLIAMS** and purchased from **WILLIAMS** 256 blue M30 pills, one Glock 43 9mm pistol bearing serial number BCUK447, two Glock switches, one extended magazine, and one drum magazine. CS-1 utilized \$5,000 in pre-recorded government funds to pay **WILLIAMS**.

17. Following the controlled purchase, CS-1 traveled back to the pre-arranged meeting location under the supervision of law enforcement. At the briefing location, CS-1 provided the firearm, switches, magazines and narcotics purchased from **WILLIAMS** to law enforcement, stating that **WILLIAMS** sold CS-1 all of the above contraband.

18. After the controlled purchase, surveillance units followed **WILLIAMS**. **WILLIAMS** drove toward Jessup, Maryland and eventually to the Red Roof Inn located in Jessup, Maryland. **WILLIAMS** met with INDIVIDUAL 1 there.

19. Surveillance units observed **WILLIAMS** bring multiple large bags and a dog crate from inside the Red Roof Inn and load them into his vehicles. Surveillance Units followed **WILLIAMS** to a Quality Inn located in Jessup, Maryland. Surveillance units observed **WILLIAMS** and INDIVIDUAL 1 load and unload multiple bags in and out of the vehicles. **WILLIAMS** and INDIVIDUAL 1 then left the Quality Inn and arrived at Super 8 motel located in Jessup, Maryland.

20. **WILLIAMS** spoke to an unknown individual in Room #104 at the Super 8, then walked to the main office of the motel. INDIVIDUAL 1 drove with **WILLIAMS** in the passenger seat to a Bank of America located in Laurel, Maryland. **WILLIAMS** was inside the bank for approximately twenty minutes.

21. INDIVIDUAL 1 and **WILLIAMS** then entered the Bank of America drive thru line and were there for approximately thirty minutes.

22. In total, CS-1 has made four controlled purchases of firearms from **WILLIAMS** totaling 10 firearms, three Glock conversion devices and prescription pills. Two of the Glock conversion devices were analyzed by ATF's Firearms Technology Criminal Branch. Both devices were found to be "designed and intended to convert a semiautomatic, Glock-type pistol into a machinegun."

23. The Hi Point 9mm rifle bearing serial number A40423 and the Hi Point 45 ACP pistol bearing serial number X4185563 were each manufactured outside of Maryland and therefore traveled in interstate or foreign commerce prior to being possessed by **WILLIAMS** on January 18, 2023.

CONCLUSION

24. Based on the aforementioned facts, I submit there is probable cause to believe that on or about January 18, 2023, **WILLIAMS** was in possession of a firearm and ammunition having been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in violation of 18 U.S.C. § 922(g)(1) (Possession of a Firearm by a Prohibited Person). Accordingly, I request that the Court authorize the attached arrest warrant for **WILLIAMS**.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

KATHERINE ROTTMAN Digitally signed by KATHERINE ROTTMAN
Date: 2023.03.01 11:13:25 -05'00'

Special Agent Katherine Rottman
Bureau of Alcohol Tobacco Firearms and Explosives

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) this _____^{1st} day of March, 2023.



THE HONORABLE AJMEL A. QUERESHI
UNITED STATES MAGISTRATE JUDGE